Case 1:04-cv-11753-JLT D
WIGGIN
Marine Surveyors & Consultants

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E-mail: David.Wiggin@verizon.net

November 12, 2004

Via U.S. EXPRESS MAIL

Mr. James Simonitsch Independent Marine Surveyor P.O. Box 192 Round Pond, ME 04564

Re: Bluewater Enterprises (c/o Joseph Galgana), F/V PRIM LADY IMU Claim OBM00328Y

ITS File 31022524 (SGS File #33818)

WMI File #2004124 Collision, August 24, 2002

Third Party – Jeff Lee Bolster, F/V SNOW GOOSE

US District Court of Massachusetts' Civil Action #04-11753-JLT

Dear Mr. Simonitsch:

Pursuant to the Court's Order and instructions from Mr. Kenneth Chiarello of the law firm Clinton & Muzyka, please find enclosed the following documents:

Mr. Rob Scanion's Damage Survey Report "Galgana – 02.10.6", 9 pages.

Mr. Rob Barry's Damage Estimate, 2 pages.

Mr. Galgana's Boating Accident Report, 3 pages.

East Bay Surveyors' Condition & Value Survey Report, 4 pages.

ITS' Preliminary Report #1 dated April 25, 2003 and copies of the photographs included with the report, 12 pages. Color re-prints of the photographs have also been provided, pages 6-12.

Copies of ITS' Additional Photographs dated April 25, 2003, pages 1-38 and Color re-prints of the photographs, pages 1-38.

ITS' Recommended Preliminary Repairs memo dated May 10, 2003 to Atty. Mason, 2 pages.

ITS' Preliminary Report #2 dated May 19, 2003 and copies of the photographs included with the report and attachments, 13 pages. Color re-prints of the photographs have also been provided, pages 5-10.

Marine Safety Consultant's May 24, 2003 Fax Cover, 1 page and their September 30, 2002 Damage Survey Report, 9 pages; D.N. Kelley's February 4, 2003 estimate, 2 pages and J&D Fiberglass Boat Repair Invoice, 1 page.

Bluewater Enterprises (c/o Joseph Galgana), F/V PRIM LADY IMU Ctaim OBM00328Y ITS File 31022524 (SGS File #33818) WMI File #2004124 Collision, August 24, 2002 Third Party – Jeff Lee Bolster, F/V SNOW GOOSE US District Court of Massachusetts' Civil Action #04-11753-JLT November 12, 2004

Gorham's Diesels' Machinery Conditions & Proposed Repairs Statement dated June 10, 2003 and their note dated July 18, 2003, 3 pages.

Please contact Mr. Chiarello should you have any questions.

The above is a statement of opinion, made and submitted without prejudice to the rights and/or interests concerned, and is subject to the terms and conditions of the policy of insurance.

Respectfully submitted,

David R. Wiggin Marine Surveyor

WIGGIN MARINE INC.

Cc: Mr. Kenneth Chiarello, Esq.

Clinton & Muzyka, P.C.

Fax #617-720-3489 (cover letter only, 2 pages)